

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

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DANA ALBRECHT,

Plaintiff,

v.

Docket No. 1:25-cv-00093-SM-AJ

HON. JOHN PENDLETON, ET AL,

Defendants.

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**MOTION FOR EXTENSION OF TIME TO FILE A RESPONSIVE  
PLEADING**

Defendant, New Hampshire Public Defender (“NHPD”), respectfully submits the following Motion to Extend Time to File a Responsive Pleading, stating in support as follows:

1. Counsel for Defendant waived service as of March 7, 2025 (see Doc. 7).
2. Defendant’s response to the Complaint is due on May 6, 2025.
3. On April 8, 2025, the Magistrate Judge issued a Report and Recommendation, recommending that this matter be dismissed. (see Doc. 12.)
4. Plaintiff moved for an extension of time until May 6, 2025 in which to object to the Report and Recommendation. (see Doc. 26.) On April 25, 2025, this motion was granted.
5. Given the pending recommendation and the extension of time to object before the District Judge acts on the Report and Recommendation, NHPD requests additional time, i.e., until June 9, 2025, to file their responsive pleading to the Plaintiff’s Complaint.
6. Counsel for Defendant has contacted Plaintiff, who initially indicated on Friday that he is “more than happy to assent to any reasonable request” but inquired about the length of

the extension. Undersigned counsel responded, indicating NHPD would be seeking an extension until June 9, 2025. Plaintiff did not, however, directly provide assent.

WHEREFORE, Defendants respectfully request this Honorable Court:

- A. Grant this Motion for Extension to Time to File Responsive Pleading; and
- B. Grant such other and further relief as is reasonable and just.

Respectfully submitted,

New Hampshire Public Defender,

MORRISON MAHONEY LLP

By /s/ Linda M. Smith

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on the following persons on this date in the manner specified herein:

Electronically Served:

/s/ Linda M. Smith

Linda M. Smith, #265038